

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIA TERESA MILIAN HERNANDEZ

DEBTOR

CASE NO 14-09594-ESL

CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, MARIA TERESA MILIAN HERNANDEZ, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated September 23, 2015, herewith and attached to this motion.
2. This Plan modification is filed to cure post-petition arrears owed to secured creditor Reliable Financial Services, Inc.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

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Post confirmation modification of chapter 13 Plan
Case no. 14-09594-ESL13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of September, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

MILIAN HERNANDEZ, MARIA TERESA

Debtor(s)

Case No. 3:14-bk-9594

Chapter 13

AMENDED CHAPTER 13 PAYMENT PLAN

- The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
- The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>9/23/2015</u>		<input type="checkbox"/> AMENDED PLAN DATED: _____ Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other									
I. PAYMENT PLAN SCHEDULE <table> <tr> <td>\$ 200.00 x 6 = \$ 1,200.00</td> <td>\$ 100.00 x 44 = \$ 4,400.00</td> </tr> <tr> <td>\$ 480.00 x 5 = \$ 2,400.00</td> <td>\$ 800.00 x 5 = \$ 4,000.00</td> </tr> <tr> <td>\$ _____ x _____ = \$ _____</td> <td></td> </tr> <tr> <td colspan="2" style="text-align: right;">TOTAL: \$ <u>12,000.00</u></td> </tr> </table> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows: _____ _____</p> <p><input type="checkbox"/> Other: _____ _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>12,000.00</u></p>				\$ 200.00 x 6 = \$ 1,200.00	\$ 100.00 x 44 = \$ 4,400.00	\$ 480.00 x 5 = \$ 2,400.00	\$ 800.00 x 5 = \$ 4,000.00	\$ _____ x _____ = \$ _____		TOTAL: \$ <u>12,000.00</u>	
\$ 200.00 x 6 = \$ 1,200.00	\$ 100.00 x 44 = \$ 4,400.00										
\$ 480.00 x 5 = \$ 2,400.00	\$ 800.00 x 5 = \$ 4,000.00										
\$ _____ x _____ = \$ _____											
TOTAL: \$ <u>12,000.00</u>											
II. DISBURSEMENT SCHEDULE <ol style="list-style-type: none"> <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>Scotiabank De Puerto</u> Cr. <u>Reliable Financial Se</u> Cr. <u>Coop A/C Federacio</u> <u>EduCoop</u> # <u>Claim 6-1Pre-petitor</u> # <u>3788 Post-Petition</u> # <u>2,424.76</u> \$ <u>1,192.80</u> \$ _____ <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <u>AEELA</u> <u>Coop A/C Federacio</u> <u>EduCoop</u> <input type="checkbox"/> Other: _____ <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>Reliable Financial Se</u> <u>Sistema De Retiro P</u> <u>Scotiabank De Puerto</u> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <p>1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</p> <p>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (Executive contracts; payment of interest to unsecureds, etc.) * Additional Attorney's Fees: \$250.00 payment for the services rendered in connection to debtor(s)' post confirmation plan and related procedures for approval, pursuant to R. 2016 (f) (3). * Additional Attorney's Fees: \$350.00 payment for the services rendered in connection to debtor(s)' confirmed post confirmation plan (dockets #29 & #34) and related procedures for approval, pursuant to R. 2016 (f)(3). * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds." * "Surrenders collateral" : Shares/savings in any Cooperativa/Association/Bank</p>											

Attorney for Debtor R. Figueroa Carrasquillo Law Office

Phone: (787) 744-7699

AMENDED CHAPTER 13 PAYMENT PLAN

Label Matrix for local noticing

0104-3

Case 14-09594-ESL13

District of Puerto Rico

Old San Juan

Wed Sep 9 16:55:59 AST 2015

SCOTIABANK DE PUERTO RICO
 CARDONA JIMENEZ LAW OFFICE PSC
 PO BOX 9023593
 SAN JUAN, PR 00902-3593

EDUCOOP
 PEDRO I TORRES AMADOR ESQ
 PO BOX 364966
 SAN JUAN, PR 00936-4966

RELIABLE FINANCIAL SERVICES
 PO BOX 21382
 SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.
 Jose V Toledo Fed Bldg & US Courthouse
 300 Recinto Sur Street, Room 109
 San Juan, PR 00901-1964

AEELA
 PO Box 364508
 San Juan, PR 00936-4508

American InfoSource LP as agent for
 DIRECTV, LLC
 PO Box 51178
 Los Angeles, CA 90051-5478

Capital Recovery V, LLC
 c/o Recovery Management Systems Corporat
 25 SE 2nd Avenue Suite 1120
 Miami FL 33131-1605

EDUCOOP
 PO BOX 364966
 SAN JUAN, PR 00936-4966

EduCoop
 Distrito 13 Caguas I
 501 Ponce De Leon
 San Juan, PR 00917-3713

Educoop
 Distrito 13 Caguas I
 Ponce De Leon 501
 San Juan, PR 00917-3713

FEDECOOP
 PMB 709 89 AVE DE DIEGO STE 105
 SAN JUAN PR 00927-6346

GAF Properties Investments Corp
 Sr Rafael A Carrion Rodriguez
 222 Calle Santiago Final
 Gurabo, PR 00778-2419

Nelnet Loans
 PO Box 17460
 Denver, CO 80217-0460

Nelnet on behalf of ASA
 American Student Assistance
 100 Cambridge Street Suite 1600
 Boston MA 02114-2567

Scotiabank De Puerto Rico
 PO Box 362394
 San Juan, PR 00936-2394

Sistema De Retiro Para Maestros
 PO Box 191879
 San Juan, PR 00919-1879

Syncb/Care Credit
 PO Box 960061
 Orlando, FL 32896-0061

US DEPT OF EDUCATION
 CLAIMS FILING UNIT
 PO BOX 8973
 MADISON, WI 53708-8973

Usdoe/Glelsi
 2401 International
 Madison, WI 53704-3121

Vergara & Associates
 Real Estate Management
 Pmb 056 Ave Esmeralda 53
 Guaynabo, PR 00969-4429

Villas Del Soporal En Gurabo
 Carr 181 Bo Celada
 Gurabo, PR 00778

JOSE RAMON CARRION MORALES
 PO BOX 9023884
 SAN JUAN, PR 00902-3884

MARIA TERESA MILIAN HERNANDEZ
 JARD DE CERRO GORDO
 B30 5 STREET
 SAN LORENZO, PR 00754-4504

MONSITA LECAROZ ARRIBAS
 OFFICE OF THE US TRUSTEE (UST)
 OCHOA BUILDING
 500 TANCA STREET SUITE 301
 SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
 PO BOX 186
 CAGUAS, PR 00726-0186

(d) RELIABLE FINANCIAL SERVICES, INC.

P.O. BOX 21382

SAN JUAN, PR 00928-1382

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) SCOTIABANK DE PUERTO RICO
CARDONA-JIMENEZ LAW OFFICE, PSC
P.O. BOX 9023593
SAN JUAN, PR 00902-3593

	End of Label Matrix
Mailable recipients	25
Bypassed recipients	1
Total	26